

COTA
for older Australians



Council on the Ageing (COTA) NSW

Submission

ABCB – Accessible Housing Options Paper 2018

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Summary

In recent years there has been increasing discourse about the type of communities that we wish to live in. This conversation has included how we design our open spaces, public amenities and housing to ensure that all Australians can actively participate in our society. The invitation to comment on the ABCB Accessible Housing Options Paper – 2018, therefore, has come at a critical time that depending on the outcome has the power to influence housing choice and the composition of communities for many years to come.

COTA NSW is the peak body representing people over 50 in NSW. We're an independent, non-partisan, consumer-based non-government organisation. We work with politicians, policy makers, service and product providers as well as media representatives to make sure our constituents' views are heard and their needs met.

Community engagement is a primary focus of COTA NSW. This is undertaken through a variety of methods, including focus groups and online surveys. The importance of housing choice and the ability to age-in-place has been consistently raised by consumers during our extensive consultation initiatives as an area of concern. There is a recognition that for many older people their current housing design will not be suitable in advancing years. That excessive steps, shower access or narrow doorways will inhibit their ability to remain in their home and in many cases their neighbourhoods as their mobility needs change.

COTA NSW strongly supports the adoption of the Livable Housing Design Guideline (LHDG) Gold level specifications as a minimum housing design standard within the National Construction Code (NCC).

The inclusion of these minimum design and construction standards will facilitate housing in Australia that will offer increased choice to older people to age in their communities, for people with disabilities to live in housing that will reduce the need for adaptation and for young families with prams to easily access their homes.

The inclusion of Gold level specifications within the NCC should also be viewed as an opportunity for the construction industry, architects and designers to incorporate and implement innovative and clever design principles, rather than a hinderance or impost that has to be resisted.

Comments are provided below under the relevant heading contained within the 'Options Paper'.

Definitions & Language

COTA NSW asserts that the terminology used 'Options Paper' is problematic as it limits the conversation about the proposed changes to the NCC as primarily benefiting People with Disability. For many people, the term 'accessible' has connotations of access relating to disability and the perception that 'accessible' design and construction is limiting and clinical. As stated previously, it is essential that the wider community understands that the introduction of the LHDG Gold level specifications into the NCC will be of benefit to everyone across all life stages. The use of term accessible as the descriptor for these changes hinders this.

COTA NSW supports the recommendation by the Centre for Universal Design Australia (CUDA) to replace the term 'accessible' the 'Liveable Housing' within the Options Paper. COTA NSW agrees that this term encompasses the concepts of universal design, adaptability and accessibility and the Livable Housing Guidelines strap line of "Championing safe, more comfortable and easier to access homes for everybody, every day, at all stages of life" (p7).¹ The term 'Liveable Housing' is positive and reinforces the aim for that housing design should be inclusive of all Australians.

Current Situation

The Options paper makes reference to the National Disability Insurance Scheme (NDIS) and National Disability Strategy (NDS) that includes the aim to incorporate universal design elements within new public and community housing dwellings. It also cites the aspiration within the NDS Strategy to encourage dialogue with the building and property industry to ensure housing more accessible and adaptable. A number of relevant policy directions contained within the Strategy are omitted. They are:

"Policy Direction 1 - Increased participation of people with disability, their families and carers in the social, cultural, religious, recreational and sporting life of the community."

"Policy Direction 2 - Improved accessibility of the built and natural environment through planning and regulatory systems, maximising the participation and inclusion of every member of the community."

¹ Livable Housing Australia (2017). *Livable Housing Design Guidelines*. 4th Edition.

“Policy Direction 3 - Improved provision of accessible and well-designed housing with choice for people with disability about where they live.”²

In addition, the Options Paper does not include reference to government policy in relation to ageing-in-place. The Commonwealth Governments, *Living Longer, Living Better* (2012) aged care reform recognised the demographic change that is occurring in Australia and the need to provide greater supports to deliver services to people in their homes and local communities. To enable this, governments at both commonwealth and state levels have espoused the importance of creating an environment that allows older people to ‘age-in-place’. Given the current estimates that by 2050, over 3.5 million Australians will access aged care each year and 80 percent of the services delivered in the persons home, this policy and demographic imperative to design homes to be ‘liveable’ is a necessary inclusion in any discussion of the current situation when considering these improvements.

Identifying the Problem

Again, COTA NSW would prefer that the Options Paper did not frame the need to design housing for all ages and abilities as a ‘problem’ that needed to be identified and justified by evidence.

As an advocate for people aged 50 and over, it is important to highlight once again the evidence that Australia has an ageing population. Recent Australian Bureau of Statistics (ABS) projections, indicate that by 2066 up to 23% of the population will be aged 65 and over.³ There are both societal and economic arguments to support older people to remain in a home that enables them to remain independent and engaged with their communities.

COTA NSW conducted an extensive survey in 2014 that explored older peoples needs and wants in relation to housing. Respondents were asked to rate features for a future house purchase. The largest requirement was for a single storey house (62%), with an easy access bathroom and shower rated the 3rd most important feature (60%). An easy access kitchen & storage and minimal steps into the home were the 5th and 6th most important features.⁴

The ABS also provides data that demonstrates the extent of households that identify as having a member with disability as 35.9%.⁵ A large portion of these households are aged 65

² Council of Australian Governments, *2010 – 2020 National Disability Strategy* (2011) p31-32

³ Australian Bureau of Statistics (ABS). 3222.0 - Population Projections, Australia, 2017 (base) - 2066

⁴ COTA NSW (2014). *50+ Report – With a focus on how and where older people are living.*
<https://www.cotansw.com.au/MediaPDFs/2014-50-Plus-Report.pdf>

⁵ ABS Survey of Disability, Ageing and Carers, Australia: Summary of Findings—2015

and over. This indicates that a significant proportion of Australian households would benefit from new housing that is designed to a gold standard.

Objective

COTA NSW is cognisant of the importance of ensuring that this section of the Options paper accurately defines it as a need of all members of the community (including renters) and utilises a holistic approach to quantify cost-benefit to ensure that savings in areas such as health and aged-care are also considered in any calculation.

The ABCB states the importance of defining the term 'accessibility'. Again, COTA NSW reiterates our concerns with this terminology and the associated interpretation within the broader community. The use of 'liveable' housing reinforces the concept of safe, comfortable and accessible housing for all ages and abilities.

In regard to the second point, consideration must be given to develop specifications that acknowledges the ageing population, the number of households with members with a disability, the needs of emergency services for safe egress into properties and the increasing numbers of households who rent and whose choice is severely limited at present if they need accessible features in a dwelling. The adoption of Gold level specifications as a minimum standard would be the most effective instrument to achieve equity in the housing market.

Lastly, an update of standards would be beneficial to those other than home buyers. Increasing numbers of people are renting in Australia. In NSW, approximately 12% of people aged 65 and over still rent.⁶ The vast majority of these people rent in the private market and do not therefore have access to minimum design standards that are available in public or community housing and in most cases will not be able to modify their homes. The lack availability of an accessible dwellings severely inhibits their housing choice and, in some cases, may result in early access to aged care facilities.

Possible Options for NCC Amendment

As noted previously, COTA NSW calls for the adoption of **Gold level specifications** in the NCC. The differences between Silver and Gold levels are marginal, with specifications 8 to

⁶ ABS (2016). Census of Population and Housing.

12 additional to Silver standard. Allowing for adequate space in a kitchen and laundry (point 8 and 9) can be easily met by good design and thoughtful layout. Point 10 requires a space on the ground floor to be used as a bedroom. Most new free-standing houses include a 4th bedroom or study. The ability to convert a study to a bedroom is not insurmountable. Light switches at a height that can be reached for all occupants (point 11) is easily achieved when wiring the dwelling. The final point (12), ensuring that occupants can easily, and independently open and close doors is again remedied with the appropriate selection of building materials and would benefit all age groups and abilities.

COTA NSW acknowledges that for some of the specifications listed, such as continuous step-free pathways and step-free entrances there will be a requirement for the inclusion of exemptions for dwellings built on steep blocks or those located in flood prone areas. These exemptions should not preclude the application of the standards to the vast majority of new Class 1a and 2 dwellings and the associated benefits to future home buyers and renters.

Concluding Remarks

The preparation for a Regulatory Impact Assessment to initiate a change to the NCC is an important opportunity to ensure that Australia's future housing will meet the needs of a diverse population across the life course.

There are demonstrable demographic imperatives to design housing that will allow older people to age-in-place. As stated previously, this will have both societal and economic benefits that must be considered when developing a cost-benefit analysis.

The inclusion of Gold level specifications as a minimum standard can be the impetus for the construction industry, architects and designers to acknowledge and respond to the changing composition of families, and the concept of the future of 'home'.